DECATHLON

Decathlon
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Secretary, Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

RE: Comment on NextNav Rulemaking Petition RM-11989 Regarding the 902-928 MHz Band. WT Docket No. 24-240.

Dear FCC Commissioners,

I am writing on behalf of Decathlon, the world's largest sporting goods retailer with operations in 72 countries, including the United States, to express our concerns regarding the petition filed by NextNav to reconfigure the 902-928 MHz band (Lower 900 MHz Band), which is currently utilized by UHF RAIN RFID and other Part 15 devices. The FCC has asked for comments about the impact on incumbents currently operating in the Lower 900 MHz Band, including the services these incumbent products provide, as well as the viability of relocation or protection of such digital and electronic devices, including products that incorporate wireless capability, in both consumer and commercial settings.

Decathlon's Use of the Lower 900 MHz Band Is an Example of the Universal and Still Growing Adoption of RFID technology, especially UHF RAIN, in the Retail and Other Industries.

As a large global retailer, Decathlon is at the forefront in the use of RAIN RFID, a wireless technology that identifies, locates, authenticates, and engages trillions of commonly used items on behalf of us as a business, our business partners, and our consumers. Decathlon relies heavily on UHF RAIN RFID technology for several critical business functions. Because RAIN RFID is a passive, battery-free wireless technology that uses a reader to read and write a tagged item, manage the data, and perform the designated action, we and our customers can identify, locate, authenticate, and engage with any item containing a RAIN RFID tag. Accordingly, our use of RFID extends across inventory management, supply chain logistics, loss prevention, and customer experience enhancement.

Because UHF RAIN RFID technology utilizes the Lower 900 MHz Band, the Lower 900 MHz Band is vital for our retail and commercial operations. First, UHF RFID enables Decathlon and other businesses to achieve a level of efficient inventory management, such that commercial retail operators can maintain accurate and real-time inventory data, reducing stockouts and overstock situations. This ensures that our customers can always find the products they need when they shop with us. Second, by leveraging UHF RFID, Decathlon can optimize our supply chain operations to track products from manufacturing to the point of sale with high precision. This real-time tracking reduces shrinkage, improves product availability, and minimizes operational costs. Third, RFID technology is integral to Decathlon's loss prevention strategies, allowing us to track high-value items and reduce theft. Fourth, RFID technology helps Decathlon provide a seamless customer experience by enabling features such as automated checkout and other emerging experiential tools and methods. This is crucial for staying competitive in the modern retail landscape, especially in the retail apparel subspace.

Decathlon, with our 1,750 retail stores around the world, has extensive global supply chains. In representing just the sporting goods sector of the retail industry, we note that the retail business is the largest RFID application sector in terms of tag numbers, and that the use of RFID continues to grow significantly, especially in retail apparel, where billions of RFID tags are required each year. Moreover, in the non-apparel sector, billions of non-apparel products will be tagged in subsequent years by Decathlon, our business partners, and retail competitors. Currently, RAIN RFID is able to identify up to 1,000 items per second. Given the scale of Decathlon's global business, and those of the sporting goods and other retail sectors, both apparel and non-apparel, RAIN RFID is incredibly useful and important to our business, and to other businesses and consumers alike.

Decathlon's Concerns about the Proposal's Negative Impact to Incumbent Uses, Products, and Services Are Material and Widespread

The proposed realignment of the Lower 900 MHz Band poses significant risks to Decathlon's operations and the broader retail industry. Reallocation or modification of the Lower 900 MHz Band would disrupt existing RFID systems, requiring costly and time-consuming adjustments, not just for businesses, but consumers as well. The disruption could lead to operational inefficiencies, increased costs, and potential service interruptions. For companies such as ours, from large conglomerates to small mom-and-pop retailers that have invested heavily in RFID infrastructure, the proposed elimination of the testing requirements of current rule section 90.353(d) and resulting impact on currently widespread and modern products would bring serious, long-lasting harm. Rendering decades of investments obsolete, the proposed changes would instantly effectuate great loss on RFID users. Decathlon understands these ramifications clearly as a global company that has adopted RFID technology into its supply chains and places of business, and as a retail business that sells RFID-tagged products to consumers.

Decathlon and thousands of other businesses, and millions of consumers and users, would be forced to bear the cost of significant additional investment and financial capital to discard formerly perfectly-usable products and services as well as to adapt to new frequency allocations. Years will have been wasted. Millions in investments would have been for naught. Billions of products would have their RFID technologies interfered with and would lose the consistency of their functionality. Given that RFID technology is central to ongoing innovation in retail industry, the disruption to such RFID-tagged devices in the form of the availability of the Lower 900 MHz Band would stifle innovation, making it harder for U.S. companies to compete in the global market.

Decathlon's Request of the FCC in this Matter Is Reasonable and Balanced.

Decathlon respectfully requests that the FCC take the following steps in response to Petition RM-11989: 1) Protect the Integrity of the Lower 900 MHz Band. While Decathlon is cognizant of the potential alleged benefits claimed by NextNav in their desire for the FCC to approve their petition, they should not come at the expense of incumbent devices and users of the Lower 900 MHz Band. Accordingly, Decathlon requests that the FCC maintain the current allocation for UHF RFID to ensure that retail and other industries can continue to operate efficiently and innovate. 2) Evaluate the Broader Impact. The FCC should conduct a comprehensive impact assessment on industries reliant on UHF RFID technology before making any changes to the Lower 900 MHz Band. This should include consultation with stakeholders across multiple sectors, which has been woefully inadequate to date from the perspective of Decathlon and business partners both in the United States and around the world. 3) Consider Alternatives. We ask that the FCC explore alternative solutions that would allow NextNav to achieve its objectives without disrupting the critical functions served by UHF RFID within the Lower 900 MHz Band.

In conclusion, there can be no doubt that the 902-928 MHz band is crucial for UHF RAIN RFID technology, which in turn is crucial for the retail industry and the broader economy. We urge the FCC to carefully consider the far-reaching implications of the proposed reconfiguration of the band and other petitioned changes, including the prevention of unnecessary and devastating financial loss and economic waste, and to prioritize the needs of industries that rely on UHF RAIN RFID technology to serve their customers and drive economic growth.

Thank you for considering our comments on this important matter.

Sincerely,

Matthew Gunawan

US Head of Legal, Decathlon